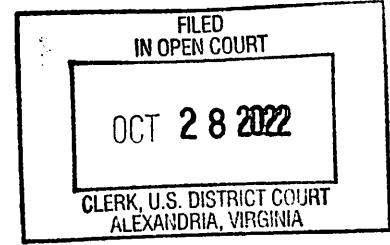


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

Case No. 1:22-cr-190

COLBY JOHN KOPP,

Defendant.

CONSENT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

The United States of America, by and through Jessica D. Aber, United States Attorney, Rachael C. Tucker, Assistant United States Attorney, respectfully moves this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). Counsel for the defendant, Colby John Kopp, has reviewed the proposed protective order and advised that he does not oppose this Motion. In support thereof, the United States submits the following:

1. During the course of the investigation, the United States has gathered or generated documents, including electronic records, which contain information about an individual or individuals cooperating with law enforcement in this case. The investigation also generated documents related to numerous individuals who are not yet charged. These documents and electronic records currently include and are anticipated to include, but are not limited to, law enforcement investigative reports, information from seized cellular devices, and other Jencks Act materials. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and any Discovery Orders that are agreed upon and entered in this case.

2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendant's investigations of the allegations and preparation of their defenses.

3. The parties will meet and confer regarding procedures for the use and introduction of evidence at trial.

4. The defendant and his counsel have reviewed this Motion and the proposed Protective Order, and have agreed to its terms.

WHEREFORE, the undersigned respectfully requests that the Court enter the proposed Protective Order.

Respectfully Submitted,

Jessica D. Aber
United States Attorney

By: _____/s/
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